

MARC R. LEWIS (State Bar No. 233306)
KENNETH M. WALCZAK (State Bar No. 247389)
PETER C. SQUERI (SBN 286249)
DANIEL JORDAN (State Bar No. 313543)
LEWIS & LLEWELLYN LLP
601 Montgomery Street, Suite 2000
San Francisco, CA 94111
Tel.: (415) 800-0590
Fax: (415) 390-2127
Email: kwalczak@lewisllewellyn.com
mlewis@lewisllewellyn.com
psqueri@lewisllewellyn.com
djordan@lewisllewellyn.com

Attorneys for Plaintiff
ALBERT RICHARDS

LISA KOBIALKA (State Bar No. 191404)
KRAMER LEVIN NAFTALIS & FRANKEL LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
Email: lkobialka@kramerlevin.com

JONATHAN M. WAGNER (admitted *pro hac vice*)
KRAMER LEVIN NAFTALIS & FRANKEL LLP
1177 Avenue of the Americas
New York, NY 10036
Telephone: (212) 715-9100
Email: jwagner@kramerlevin.com

TODD A. ROBERTS (State Bar No. 129722)
MARTIN D. DIOLI (State Bar No. 172775)
ROPERS MAJESKI PC
535 Middlefield Road, Suite 245
Menlo Park, CA 94025
Telephone: (650) 364-8200
Facsimile: (650) 780-1701
Email: todd.roberts@ropers.com
martin.dioli@ropers.com

Attorneys for Defendants
CENTRIPETAL NETWORKS, LLC, STEVEN
ROGERS AND JONATHAN ROGERS

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ALBERT RICHARDS,

Plaintiff,

v.

CENTRIPETAL NETWORKS, LLC f/k/a
CENTRIPETAL NETWORKS, INC.;
STEVEN ROGERS; JONATHAN
ROGERS; and JOHN DOES 1-10,

Defendants.

Case No. 4:23-cv-00145-HSG

**STIPULATION TO EXTEND DEADLINE
TO FILE DISCOVERY MOTION; ORDER**

Local Civ. R. 6-1, 6-2, 7-12

Judge: Hon. Haywood S. Gilliam, Jr.

Pursuant to Civil Local Rules 6-1, 6-2 and 7-12, the Parties hereby stipulate to and request that the Court extend the current deadline for Plaintiff Albert Richards (“Plaintiff”) to move to compel further responses and/or production of documents in response to discovery requests served on Defendant Centripetal Networks, LLC (“Defendant”).

RECITALS

WHEREAS, on May 14, 2024, Plaintiff served his first set of requests for production and first set of interrogatories on Defendant (the “Requests”);

WHEREAS, under Local Rule 37-3, “no discovery-related motions may be filed more than seven days after the discovery cut-off”;

WHEREAS, the discovery cutoff in this matter passed on July 22, 2024;

WHEREAS, therefore, the deadline to move to compel discovery on the Requests is seven days after that date, on July 29, 2024;

WHEREAS, counsel for Plaintiff sent a meet and confer letter concerning the Requests on July 9, 2024, to which counsel for Defendant responded on July 19, 2024;

WHEREAS, counsel for the Parties conferred via telephone on July 25, 2024;

WHEREAS, on July 26, 2024, Court granted Plaintiff’s unopposed administrative motion, per the Parties’ stipulation, requesting an extension of the motion to compel deadline to August 12, 2024;

WHEREAS, the Parties have subsequently continued their meet-and-confer efforts, and believe there continues to be potential for agreement on outstanding discovery disputes;

WHEREAS, the Parties mutually believe that an additional extension of time for meet-and-confer discussions may yield agreement without the need for judicial intervention, which would prevent undue costs and preserve judicial resources;

WHEREAS, Plaintiff has not as yet produced any documents in response to Defendants’ First Set of Requests for Production of Documents, served on May 10, 2024;

WHEREAS, the Parties agree that in the event that they cannot timely resolve any issues concerning such production, when made, Plaintiff will not oppose the filing of an appropriate Administrative Motion to Extend Time to File Discovery Motion;

WHEREAS, the requested relief will not unduly impact the Court's case schedule; and

WHEREAS, Defendants do not oppose Plaintiff's Administrative Motion to Extend Time to File Discovery Motion, filed herewith;

THEREFORE, the Parties, through their counsel, hereby stipulate and agree to request that the Court extend the deadline for Plaintiff to bring a discovery motion with regard to the Requests, to August 26, 2024, to facilitate ongoing meet and confer efforts.

IT IS SO STIPULATED.

Dated: August 8, 2024

LEWIS & LLEWELLYN LLP

By: */s/ Kenneth M. Walczak*

Marc R. Lewis
Kenneth M. Walczak
Peter C. Squeri
Daniel Jordan

Attorneys for Plaintiff
ALBERT RICHARDS

Dated: August 8, 2024

KRAMER LEVIN NAFTALIS & FRANKEL
LLP

By: */s/ Jonathan M. Wagner*

Jonathan M. Wagner

Attorney for Defendants
CENTRIPETAL NETWORKS, LLC,
JONATHAN ROGERS, and STEVEN ROGERS

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED. The last day for Plaintiff to file a discovery motion in connection with the Requests shall be August 26, 2024.

Date: 8/8/2024



Hon. Haywood S. Gilliam, Jr.
United States District Judge